

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

CARA MCCLURE, et al.,

*Plaintiffs,*

v.

JEFFERSON COUNTY  
COMMISSION,

*Defendant,*

ALEXIA ADDOH-KONDI, et al.,

*Plaintiffs,*

v.

JEFFERSON COUNTY  
COMMISSION,

*Defendant.*

No. 2:23-cv-00443-MHH

No. 2:23-cv-00503-MHH

***PRO HAC VICE* MOTION FOR MARIE E. SAYER**

Pursuant to Local Rule 83.1, the applicant, Marie E. Sayer, an attorney at Consovoy McCarthy PLLC, hereby moves this Court to permit her to be admitted to practice before this Court in this matter *pro hac vice* on behalf of Defendants. In support of her application and pursuant to 28 U.S.C. § 1746, Marie Sayer hereby declares as follows under penalty of perjury:

1. I am eligible and qualified to be admitted to practice before this Court *pro hac vice*. I am a resident of Illinois. I am an attorney with the law offices of Consovoy McCarthy, PLLC, 1600 Wilson Blvd., Suite 700, Arlington, VA 22209; phone (703) 243-9423; email: [mari@consovoymcarthy.com](mailto:mari@consovoymcarthy.com). I am a member in good standing in the District of Columbia, Wisconsin, the U.S. Court of Appeals for the Armed Forces, and the Ninth Circuit.
2. Michael Taunton of Balch & Bingham, located at 1901 6<sup>th</sup> Avenue North, Suite 1500, Birmingham, AL 35203, phone (205) 226-3451, email: [mtaunton@balch.com](mailto:mtaunton@balch.com) will continue to serve as local counsel. His signature below is his written consent to be so designated.
3. I understand that by appearing in this case, I am subject to the rules of this Court, just as if a member of the Bar of this District.
4. I have read and understand the local rules applicable in this District, the Alabama State Bar Code of Professional Courtesy and the Lawyer's Creed, and this Court's CM/ECF requirements.
5. Pursuant to General Order 19-0003 of the United States District Court for the Northern District of Alabama, the required \$75.00 fee is being sent to the Clerk immediately with the filing of this application.

WHEREFORE, the undersigned respectfully requests that the application for admission *pro hac vice* of Marie Sayer in the above captioned matter be granted.

Dated: December 18, 2024

Respectfully submitted,

/s/ Michael Taunton  
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*Attorney for Defendants*

/s/ Marie E. Sayer  
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*Applicant Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and service will be perfected upon the following CM/ECF participant(s) electronically on this the 18<sup>th</sup> day of December.

/s/ Michael Taunton

OF COUNSEL